

AO 91 (Rev 8/01) Criminal Complaint

United States District Court

SOUTHERN

**DISTRICT OF
McALLEN DIVISION**

TEXAS

**UNITED STATES OF AMERICA
V.**

Jaime Javier GARZA (YOB: 1980) USC

CRIMINAL COMPLAINT

United States District Court
Southern District of Texas
FILED

Case Number: **M-20-0942 -M**

MAY 06 2020

David J. Bradley, Clerk

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my

knowledge and belief. On or about May 4, 2020 in Starr County, in

the Southern District of Texas the defendant(s)

(Track Statutory Language of Offense)

Bulk Cash Smuggling Into or Out of the United States

in violation of Title 31 United States Code, Section(s) 5332 (a)(1)

I further state that I am a(n) Texas DPS CID Special Agent and that this complaint is based on the following facts:

See attached affidavit.

Continued on the attached sheet and made a part of this complaint:

Yes ☒ No

Approved by: AUSA Patricia Cook Profit

Submitted by reliable electronic means, sworn to and attested
to telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

/s/ Aracely Palmer

Signature of Complainant

May 6, 2020 11:19 a.m.

Aracely Palmer

as DPS CID Special Ag

Juan F. Alanis, U.S. Magistrate Judge

Name and Title of Judicial Officer

[Signature]
Signature of Judicial Officer

Attachment 1

On May 4, 2020, at approximately 1:00 p.m., United States Border Patrol (USBP) Agents were conducting surveillance near the Los Puertos boat ramp and Mexican House road in La Casita, Texas which is an area known for northbound narcotics and southbound bulk currency smuggling.

At approximately 2:25 p.m., a USBP Agent observed a Grey Jeep Liberty and a white Ford F-150 on the Mexican side of the Rio Grande River, south of the Los Puertos boat ramp. USBP Agents observed several male subjects exit the white Ford F-150. The male subjects inflated a raft and put on life jackets. A USBP Agent observed three subjects get in the raft and the subjects travel across the river towards the United States (U.S.). Shortly after the subjects had crossed into the U.S., a USBP Agent observed a light green GMC Sierra Quad Cab traveling south on Mexican House road. A USBP Agent observed the vehicle turn south towards the Los Puertos boat ramp. A USBP Agent observed the GMC Sierra drive towards the subjects waiting at the Los Puertos boat ramp. A USBP Agent observed a single, slender, male subject operating the GMC Sierra as it passed his position. The driver, later identified as Jaime Javier GARZA, opened his window, and threw a large plastic bag out of the window towards the subjects who were at the boat ramp. An Agent subsequently approached the subjects, identified himself as law enforcement and attempted to interdict the plastic bag and subjects but they quickly absconded to Mexico.

GARZA subsequently departed the area at a high rate of speed and continued north from the Los Puertos boat ramp. A quick visual search of the plastic bag revealed that it contained a bulk quantity of U.S. currency that was wrapped in plastic, along with a plastic pill bottle containing a white powdery substance.

USBP Agents responded to the area in an attempt to stop the GMC Sierra that GARZA was driving. Shortly thereafter, USBP agents located the GMC Sierra approximately ½ to one (1) mile north of the Los Puertos boat ramp. GARZA was subsequently placed under arrest for Bulk Cash Smuggling Into or Out of the United States (31 USC 5332 (a)(1)).

In a post-arrest, mirandized interview, GARZA stated to the Agents that he had been in the area of the Los Puertos boat ramp. GARZA stated that a male subject, known to GARZA as NATHAN BAZAN, arrived at GARZA'S residence earlier in the day and asked to be taken to the Los Puertos boat ramp. GARZA stated that GARZA observed BAZAN carrying a brown bag into GARZA's GMC Sierra. GARZA stated that as GARZA and BAZAN approached the Los Puertos boat ramp they saw multiple Hispanic male subjects walking from the Rio Grande River. GARZA stated that BAZAN requested GARZA to drive away from the area at a high rate of speed. Subsequent to GARZA leaving the

area, GARZA stated that he did not know where BAZAN went. However, prior to GARZA'S arrest, extensive surveillance was conducted by USBP Agents which indicated that GARZA was the sole occupant of the GMC and Agents observed GARZA throw the package out of the driver's side window of the vehicle.

On May 5, 2020, the U.S. currency was officially counted and it was determined to be \$221,620.00.